

I. PURPOSE

The purpose of this policy is to establish requirements and procedures for departments to receive authorization to apply for, accept and use federal or state funding available to respond to the Novel Coronavirus Pandemic (COVID-19) Public Health Emergency. These procedures will assist departments in the goal of maximizing the use of federal and state funding available to cover County costs of responding to the Emergency, while ensuring accountability for the use of the funds.

II. POLICY

- A. This policy covers all County departments and staff and applies to any and all applications for, acceptances of or use of state or federal funding made available to address the impact of COVID-19. Board Policy A-6 – Grant Applications does not apply to the funding sources covered by this policy.
- B. Funding sources covered by this policy include:
 - 1. Coronavirus Preparedness and Response Supplemental Appropriations Act;
 - 2. Families First Coronavirus Response Act;
 - 3. Coronavirus Aid, Relief and Economic Security Act (CARES Act);
 - 4. Paycheck Protection Program and Healthcare Enhancement Act; and

This policy also includes any other legislation or action by the federal or state government. This policy does not apply to funding that the County receives automatically and would not normally require Board approval to accept, such as increases in the share of federal or state financial participation in existing programs.

- C. Departments are responsible for identifying funding opportunities from program-specific funding sources relevant to their areas of responsibility, researching the requirements, and determining whether, in their view, the County should apply for and/or accept the funds. If the use of the funds potentially involves more than one department, departments should coordinate. Departments shall notify the Chief Administrative Office of their intent to apply for program-specific grants.
- D. If awarded, a Department Head may accept grant funds where there is no required County match, subject to approval by the Chief Administrative Officer and review and approval by County Counsel of any required grant agreements. Acceptance of any grant that requires matching funds must be approved by the Board of Supervisors.

III. PROCEDURE

- A. Application for and Acceptance of Program-Specific Funds by Departments:

Program-specific funds refers to funding programs that Departments typically apply for or receive with Board approval. Program-specific funding sources include but are not limited to, for example, expanded programs under the CARES Act (e.g., FEMA's Emergency Management Program, CDC's Public Health Emergency Preparedness Program, Community Services Block Grant funding, Community

Development Block Grant program, Airport Improvement Program funding, Department of Justice's Byrne-Justice Assistance Grant Program).

1. Departmental Responsibilities: If a department applies for and accepts funds, the department shall:
 - a) Prepare any and all documents and obtain necessary signatures by routing those documents through their assigned CAO Analyst.
 - b) Submit any application or take any other actions necessary to apply for or accept the funds. In applying/receiving funds, when a Data Universal Number System (DUNS) number and or Commercial and Government Entity (CAGE) identifier are needed, the Department should use the County's DUNS number and CAGE identifier.
 - c) Prepare any and all documentation, contracts or Board letters necessary to spend the funds through existing policies and procedures.
 - d) Take appropriate actions necessary to account for the receipt and use of funds, developing and maintain all supporting records, receipts and documents relevant to the use of the funds in accordance with federal or state requirements.
 - e) On a monthly basis, through the duration of this public health emergency, provide a status of any funds accepted/spent through this process to the Chief Administrative Office.
 - f) Departments are responsible for accounting for funds for budget, SEFA reporting, etc. using the same process and procedures as for any other grant funding.

2. Chief Administrative Officer Responsibilities

The Chief Administrative Office will maintain a central document of all funding applied for and accepted and provide a monthly report to the Board of Supervisors that identified funding applied for, accepted, the funding source and the use of the funds. The document will be shared with and available to all Department Heads.

B. Application for use of Centrally Administered Funds

Certain funding sources related to COVID-19 are not restricted to specific programs or services, but can be used broadly to address needs or issues associated with the Emergency (e.g., the CARES Act Coronavirus Relief Fund).

1. Requesting Use of Centrally Administered Funds:

Departments can submit requests for use of these funds to the Chief Administrative Office. In requesting the use of these funds, departments should identify whether any more restrictive funds are available for the same purpose and should utilize those funds first.

- a) CAO Analyst Review: The CAO Analyst will review the request, seek clarification and identify any issues and then forward the request and recommendation to the Chief Administrative Officer.
- b) Office of Emergency Services Review: Each request will then be forward to the Office of Emergency Services for review of each request and a final recommendation to the Chief Administrative Officer.
- c) Chief Administrative Officer Review: The CAO will approve or deny the request and the request will be returned to the appropriate CAO Analyst and Department.
- d) Approved Allocations: The Chief Administrative Office will maintain a central document of approved allocations of centrally administered funding that will be included in the monthly report to the Board of Supervisors. The document will be shared with and available to all Department Heads.

e) Department Responsibilities for Centrally Administered Funds:

Departments authorized to drawdown centrally allocated funds will:

- i. Prepare any and all documents, contracts, Board letters, etc. that are necessary to spend the funds through the normal channels.
 - ii. Take appropriate actions necessary to account for the receipt and use of the funds, including consulting with the Auditor-Controller on the appropriate coding for the receipt and expenditure of the funds.
 - iii. Drawdown funds to reimburse the cost of relevant expenditures by submitted a claim form to the Auditor-Controller, with supporting documentation for review prior to funds being disbursed, as requested by the Auditor-Controller.
 - iv. Establish coding to enable monitoring and reporting on all funds expended, as well as to ensure the same costs are not being reimbursed by other funding sources.
- f) Auditor-Controller Review: Following receipt of a claim form, the Auditor-Controller will review to ensure the request is properly supported, is consistent with approved use of funds and the amount authorized for allocation and, if appropriate, process the request to allocate the funds to the Department. The CAO Analyst will include the status of funds drawn down on the central shared document of approved allocations.

g) Department Agreements Regarding Use of Funds

By requesting Coronavirus Relief Funds, Departments are agreeing to the following:

- i. Expenditures are allowable per Coronavirus Relief Fund Guidance issued by the U.S. Treasury.

- ii. Expenditures are allowable per Uniform Administrative Requirements 2 CFR 200.
- iii. When requesting drawdown, the claim is to be supported by expenditure support such as general ledger expenditure detail and supporting schedules that reconcile to the claim.
- iv. Expenditures are subject to Internal and External audit review.

V. RESPONSIBLE DEPARTMENT

Chief Administrative Office

VI. DATES ISSUED AND REVISED; SUNSET DATES:

Issue Date:	06/23/2020	Sunset Review Date:	06/23/2024
Revision Date:	N/A	Sunset Review Date:	N/A